

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

M-EDGE ACCESSORIES LLC
1360 Blair Drive
Odenton, MD 21113-1343

Plaintiff,

v.

AMAZON.COM INC.,
1200 12th Avenue South, Suite 1200
Seattle, Washington 98114-2734

Serve on:

AMAZON.COM INC.,
c/o Corporation Service Company
6500 Harbour Heights Parkway
Suite 400
Mukilteo, Washington 98275

and

AMAZON.COM INC.,
1200 12th Avenue South, Suite 1200
Seattle, Washington 98114-2734

Defendant.

Case No. **ELH11CV3332**

JURY TRIAL DEMANDED

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2011 NOV 18 P 2:14
CLERK'S OFFICE
AT BALTIMORE
DEPUTY

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, M-Edge Accessories LLC ("Plaintiff" or "M-Edge") complains of Defendant Amazon.com Inc., ("Defendant" or "Amazon") as follows:

1. This is a claim for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of this case under 28 U.S.C. § 1338(a).

2. M-Edge Accessories LLC ("M-Edge") is a Maryland limited liability company with a place of business at 1360 Blair Drive, Odenton, MD 21113-1343.

3. Plaintiff owns the right, title and interest in and has standing to sue for infringement of United States Patent No. 8,047,670 (the "'670 Patent") entitled "Booklight for a Protective Cover of an eReader" which issued on November 1, 2011. The '670 Patent is attached hereto as **Exhibit A**.

4. On information and belief, Defendant Amazon.com Inc. ("Amazon") is a Delaware corporation with its corporate headquarters and principal place of business at 1200 12th Avenue South, Suite 1200, Seattle, Washington 98114-2734. Amazon has appointed its agent for service as follows: Corporation Service Company, 6500 Harbour Heights Parkway, Suite 400, Mukilteo, Washington 98275.

5. Amazon transacts substantial business in this judicial district and has committed acts of infringement in this judicial district, at least by soliciting advertising from Maryland companies and by operating Internet websites and conducting business over those Internet websites that are accessible to residents of Maryland, including www.amazon.com, which offers for sale products which infringe the '670 patent.

6. Venue is proper in this district under 28 U.S.C. §§ 1391 and 1400(b).

7. Amazon has infringed, and is now at least directly infringing, at least claim 1 of the '670 Patent through, among other activities, the manufacture, use, sale and/or offer for sale of covers for eReaders with integrated lights, including but not limited to Amazon's Kindle Lighted Leather Cover. Amazon also has infringed the '670 Patent by contributing to the infringement of others through the use, sale, and offer for sale of such products with its Kindle eReaders.

8. Amazon's infringement and contributory infringement has injured Plaintiff and Plaintiff is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

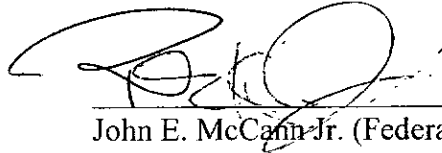
WHEREFORE, Plaintiff M-Edge Accessories LLC respectfully requests this Court enter judgment against Defendant Amazon, and against its subsidiaries, successors, parents, affiliates, officers, directors, agents, servants, employees, and all persons in active concert or participation with it, granting the following relief:

- A. The entry of judgment in favor of Plaintiff and against the Defendant;
- B. An award of damages adequate to compensate Plaintiff for the infringement that has occurred, together with prejudgment interest from the date the infringement began, but in no event less than a reasonable royalty as permitted by 35 U.S.C. § 284;
- C. A permanent injunction prohibiting further infringement, inducement and/or contributory infringement of the '670 Patent; and,
- D. Such other relief that Plaintiff is entitled to under law and any other further relief that this Court or a jury may deem just and proper.

Jury Demand

Plaintiff demands a trial by jury on all issues presented in this complaint.

Respectfully submitted,



John E. McCann Jr. (Federal Bar No. 10028)

Ranak K. Jasani (Federal Bar No. 27383)

MILES & STOCKBRIDGE P.C.

10 Light Street

Baltimore, Maryland 21202

Telephone: (410) 727-6464

Fax: (410) 385-3700

jmccann@milesstockbridge.com

rjasani@milesstockbridge.com

Arthur A. Gasey (*applying pro hac vice*)

Paul K. Vickrey (*applying pro hac vice*)

Niro, Haller & Niro

181 W. Madison, 46th Floor

Chicago, IL 60602

Telephone: (312) 236-3137

Fax: (312) 236-3137

gasey@nshn.com

vickrey@nshn.com

Attorneys for Plaintiff, M-Edge Accessories LLC